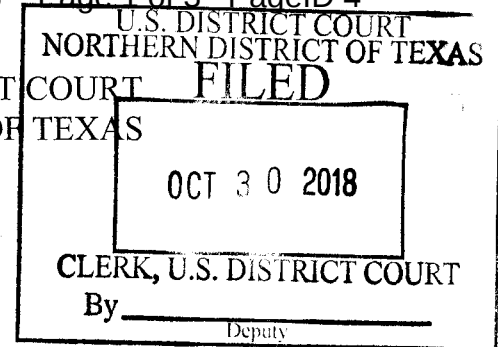


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

LAURIE ANN REESE

No.

4-18CR-269-Y

INFORMATION

THE UNITED STATES ATTORNEY ALLEGES THAT:

COUNT ONE

Violation: 18 U.S.C. § 1344
(Bank Fraud)

A. Introduction

At all times material to this Information:

1. Defendant **Laurie Ann Reese** ("**Reese**") was a controller for the Jewish Federation of Fort Worth and Tarrant County ("JFFWTC"). Accordingly, she managed JFFWTC's financial accounts and prepared checks for signature.

2. The American National Bank of Texas was a financial institution as defined in 18 U.S.C. § 20 and was located in Fort Worth, Texas, in the Northern District of Texas. JFFWTC maintained a checking account at the American National Bank of Texas.

B. The Scheme and Artifice

3. Between on or about January 6, 2013, through on or about April 19, 2018, in the Northern District of Texas, defendant **Reese** did knowingly and intentionally

execute a scheme to defraud the American National Bank of Texas, and to obtain money or property under the custody and control of the American National Bank of Texas by means of materially false and fraudulent pretenses, representations, and promises.

C. The Manner and Means of the Scheme and Artifice

4. **Reese**, without lawful authority, knowingly and fraudulently used a signature stamp of a JFFWTC executive and forged the signature of a different JFFWTC executive on JFFWTC checks drawn from JFFWTC's checking account at the American National Bank of Texas.

5. **Reese** made the checks payable to herself, and caused the checks to be presented at various financial institutions located in the Northern District of Texas.

6. In an effort to conceal her fraudulent activity, **Reese** falsified financial records and moved monies between accounts prior to annual audits.

7. **Reese's** fraudulent scheme extended to approximately 326 fraudulent checks in the approximate amount of \$992,854.02.

D. The Execution of the Scheme and Artifice

8. On or about December 29, 2014, **Reese** wrote JFFWTC check number 6303 drawn from JFFWTC's American National Bank of Texas checking account in the amount of \$3,108.67. **Reese** made the check payable to **Laurie Reese**, fraudulently used a JFFWTC executive's stamp and forged another JFFWTC executive's signature purportedly authorizing the check, and **Reese** presented the check to Southwest Bank, located at 740 S. Saginaw Boulevard Saginaw, Texas 76179, in the Northern District of Texas. **Reese** then caused \$3,108.67 to be deposited into **Reese's** personal bank

account.

In violation of 18 U.S.C. § 1344.

Respectfully submitted,

JEFFERSON B. SESSIONS, III
ATTORNEY GENERAL

JOSEPH D. BROWN
U.S. ATTORNEY
Eastern District of Texas



CHRISTOPHER A. EASON
Special Attorney to the U.S. Attorney General